

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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U.S. DISTRICT COURT
SAN JUAN, P.R.

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO As representative of THE COMMONWEALTH OF PUERTO RICO, et al,	PROMESA Title III No. 17 BK 3283-LTS No. 17 BK 3556 (Jointly Administered) This filing relates to the Commonwealth, HTA and ERS
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**CLAIMANT RESPONSE TO ONE HUNDRED SIXTY-NINTH OMNIBUS OBJECTION
TO THE HONORABLE COURT:**

APPEARING, Sonia M. Vazquez-Cintrón, Pro Se, on her behalf without legal representation
and with all due respect, EXPOSES, ALLEGES AND REQUESTS:

- S.M.V.*
- 1- That on June 29, 2018, I filed electronically, Proof of Claim number 85918 as creditor of the Employment Retirement System of the Government of the Commonwealth of Puerto Rico (ERS).
 - 2- That said Proof of Claim, incorrectly checked that the claim was against the Commonwealth of Puerto Rico, when it should have checked the ERS option on case number 17-bk-03566 and not case 17-BK-3283.
 - 3- That on the first weeks of March, I received a motion filed by the Financial Oversight and Management Board objecting to my claim indicating it has insufficient evidence. Immediately I contacted the government agency I last worked for in order to obtain a

statement of my contributions to the ERS system. They advise me to contact the "Administracion de Retiro", to get such type of document, which I did immediately.

- 4- It is important to indicate that on the last months of 2019, I started the process of requesting my retirement benefits from the ERS, since I turned 65 years old on September said year. I am an ex-employee of the Commonwealth of Puerto Rico, that contributed for 12 years to the retirement fund (ERS) and am entitled to a pension once I reached the retirement age, in this case 65 years old. I submitted all the required documents and I am still waiting for a determination of the amount of retirement I will receive monthly and when will I start receiving it. The amount of my contributions should be more than \$50,000 or even reach the \$100,000 since I paid my contributions for 12 years with some high salaries.
- 5- I contacted by phone the ERS office and they took my information to provide me with the required document. That was on the week of March 9th to 13th.
- 6- You should be aware that all government employees stopped working from March 16th up to this moment because of the Governors Executive Order 2020-023 and its subsequent extension by Executive Order 2020-029. Because of that, I cannot have access to any document that can determine the amount of money that it is owed to me in pension or retirement rights. In other words, I have not received a statement of my contributions and cannot attach it to this motion as proof of the amount the ERS owes me.
- 7- I can answer you any other personal information that can help in the process of identifying my claim.
- 8- My personal information is:
- a. Sonia M. Vazquez Cintron
 - b. Urb. Villas del Sol, 209 Calle Marbella, Carolina, Puerto Rico 00985-5102
PO Box 9945, Carolina, Puerto Rico 00988-9945
 - c. (787) 367-6173

One

- 6m
- d. svazcin@gmail.com
 - e. Proof of Claim 85918
 - f. I worked from July 1990 to august 1995 with the Puerto Rico Industrial Development Administration (PRIDCO) and from September 1995 to august 2002 with the Economic Development Bank of Puerto Rico (EDB). On both jobs I contributed to my retirement fund at the ERS.
 - g. As previously indicated, I do not have a copy of the statement issued by the ERS detailing my contributions to their fund. I requested it when I applied for retirement benefits to no avail and again when I received the Motion objecting my claim, with no results do to the Covid19 curfew and government shutdown.
 - h. Up to this moment I do not know the amount of money I am owed, neither how much I will receive monthly eventually. I have asked for an estimate, but no one seems to be in position of telling me.
 - i. My social security last four number are 7386 and was born on 1954.
 - j. My claim is solely related to the pension I am owed having worked for 12 years with the Commonwealth of Puerto Rico.
 - k. I do not have any claim or legal action filed against the government in the Puerto Rico judicial system. I do have filed for retirement payment through the ERS regular procedure.
 - l. I do not have any unpaid judgement or decree in my favor. I only have my ERS contributions and my request of pension filed at their office.
 - m. Attached copies of the Notice received and of the Cover of the Motion filed by de FOMB indicating deadlines and date of hearing.

WHEREFORE, Sonia M. Vazquez Cintron, Pro Se, respectfully requests that the objection to my claim number 85918, be dismissed and that as a result of that, I will be considered a creditor of

the Employees Retirement System of the Commonwealth of Puerto Rico (ERS) with right to be paid a monthly pension as determined from the first day I started working with the government or to receive the full amount deposited in my account with the ERS.

In San Juan, Puerto Rico. Today, 6th of April 2020.

RESPECTUFULLY SUBMITTED.

I certify that I send today a true and identical copy of this motion to attorneys for the Financial Oversight and Management Board at their addresses of record: O'Neill & Borges, 250 Muñoz Rivera Ave., San Juan, Puerto Rico 00918-1813 and Proskauer Rose LLP, Eleven Times Square, New York, NY 10036, Counsel for the Creditors Committee to Paul Hasting LLP, 200 Park Avenue, New York, NY 10166, Att: Luc A. Despina, James Bliss, James Worthington and G. Alexander Bongartz. The original was filed at the Clerks Office through their electronic filing and if that did not succeed, by mail to their address at 150 Chardon Avenue, Federal Building, San Juan, Puerto Rico 00918.



Sonia M. Vazquez Cintron
Claimant/Creditor 85918
PO Box 9945
Carolina, PR 00988-9945
(787) 367-6173
svazcin@gmail.com